

LAW DEPARTMENT
TOWNSHIP OF BELLEVILLE
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Attorneys for Creditor

IN RE:
GEORGE J. DROSTE

:UNITED STATES BANKRUPTCY COURT
:DISTRICT OF NEW JERSEY
:
:CASE NO.: 17-32114 VFP
:
:HEARING DATE: Not yet scheduled
:

CREDITOR'S OBJECTION TO DEBTOR'S MOTION TO SELL PROPERTY

Steven J. Martino, Esq., by way of objection to the Debtor's Motion to Sell Property, respectfully objects as follows:

1. The Debtor indicates that the Township of Belleville was due \$4,481.33 under the Plan and that the claim has been paid down through the Chapter 13 Plan to \$658.16.
2. In addition to the balance due under the Plan, the Debtor is indebted to the Township of Belleville post-petition taxes of \$11,447.10 and interest of \$635.86 for a total as of June 9, 2021 of \$12,082.96. See Certification of Mary Cabanillas, Tax Collector for the Township of Belleville submitted herewith.
3. In addition, the Debtor has post-petition water charges of \$434.43 as of June 9, 2021.

Dated:

6/17/21



Steven J. Martino, Esq., Attorney for Creditor
Township of Belleville

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**CERTIFICATION IN SUPPORT OF
CREDITOR'S OBJECTION TO DEBTOR'S MOTION TO SELL PROPERTY**

1. I, Mary Cabanillas, am the Tax Collector for the Township of Belleville and submit this Certification in opposition to the Debtor's Motion to Sell 19 Yale Street, Belleville, New Jersey free and clear of liens.

2. As the Tax Collector of the Township of Belleville, I am responsible for collecting the taxes and water charges due for all the properties located in the Township of Belleville.

3. In addition to the pre-petition taxes due, as of June 9, 2021, there are outstanding post-petition taxes due for the Debtor's property located at 19 Yale Terrace, Belleville, New Jersey in the principal amount of \$11,447.10 and interest of \$635.86 for a total of \$12,082.96. These taxes are due for a portion of the third quarter of 2020, the fourth quarter of 2020, and the first and second quarters of 2021.

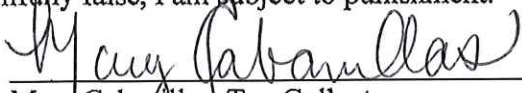
4. In addition, the Debtor has failed to make his post-petition water payments totaling \$426.34 for actual usage and \$8.09 in interest for a total of \$434.43.

5. These water charges are for a portion of the second quarter of 2020, the third and fourth quarters of 2020, and the first and second quarters of 2021.

6. The total due as of June 9, 2021 for taxes and water for 19 Yale Terrace is \$12,517.39.

I hereby certify that the foregoing statements made by me are true. I am aware if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 6/17/21



Mary Cabanillas, Tax Collector
Township of Belleville